

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

:
:
:
:
:
:
:
:
:
:

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-FIRST MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD APRIL 1, 2022 THROUGH APRIL 30, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	April 1, 2022 through April 30, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$193,336.80 (80% of \$241,671.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-first monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing April 1, 2022 through April 30, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$241,671.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$193,336.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$996.03. The blended hourly rate of paraprofessionals during the Application Period is \$344.99.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$0.00 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$0.00.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$193,336.80 (80% of \$241,671.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$0.00 (100%), for a total amount of \$193,336.80 for the Application Period.

Dated: May 16, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	4.3	\$860.00
A009	Meetings / Communications with AHC & Creditors	9.0	\$14,835.00
A019	Plan of Reorganization / Disclosure Statement	2.3	\$4,035.00
A020	Insurance Adversary Proceeding	250.5	\$221,941.00
		266.1	\$241,671.00

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	9.0	\$16,200.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	53.9	\$78,155.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	25.7	\$37,265.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850	36.0	\$30,600.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia – 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court – 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$785	10.3	\$8,085.50
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	37.9	\$26,530.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$610	5.1	\$3,111.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	14.8	\$9,028.00
Ethan Kaminsky	Associate / State of New York – 2018	\$560	29.4	\$16,464.00
Christian Carey	Associate / District of Columbia - 2020	\$475	8.1	\$3,847.50
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	18.8	\$7,990.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	3.5	\$1,312.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	2.9	\$942.50
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	10.7	\$2,140.00
	Totals		266.1	\$241,671.00
	Attorney Blended Rate	\$996.03		
	Paraprofessional Blended Rate	\$344.99		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
N/A	\$0.00
Total	\$0.00

Exhibit D

Time and Expense Detail

GILBERT LLP

700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

May 10, 2022
Invoice Number: 11326795
Client Number: 1599

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	241,671.00	.00	241,671.00
Total	241,671.00	.00	241,671.00
TOTAL FEES			\$ 241,671.00
TOTAL EXPENSES			<u>\$.00</u>
TOTAL FEES AND EXPENSES			\$ 241,671.00

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	4/04/22	Review and organize recently filed insurance-related pleadings.	1.40	280.00
Turner, C.	4/11/22	Review insurance-related pleadings filed in the case.	.90	180.00
Turner, C.	4/18/22	Review insurance-related pleadings in the case.	.90	180.00
Turner, C.	4/22/22	Calendar omnibus hearing.	.20	40.00
Turner, C.	4/25/22	Review insurance-related pleadings recently filed in case.	.90	180.00
Project Total:			4.30	\$ 860.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	4/05/22	Confer with AHC re plan.	.50	900.00
Gilbert, S.	4/06/22	Confer with AHC and fifteen re next steps.	.50	900.00
Gilbert, S.	4/06/22	Confer with AHC re strategy.	1.00	1,800.00
Hudson, J.	4/06/22	Confer with AHC meeting re case update.	.50	392.50
Hudson, J.	4/13/22	Confer with AHC re status.	.30	235.50
Gilbert, S.	4/19/22	Confer with AHC re status.	.50	900.00
Gilbert, S.	4/26/22	Confer with AHC re appeal (1.8); analyze Second Circuit argument (2.2).	4.00	7,200.00
Gilbert, S.	4/27/22	Confer with AHC and fifteen re next steps.	.50	900.00
Shore, R.	4/27/22	Confer with AHC re update.	1.00	1,450.00
Hudson, J.	4/27/22	Attend AHC meeting (partial) re appeal.	.20	157.00
Project Total:			9.00	\$ 14,835.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	4/29/22	Attend oral argument in Second Circuit.	2.00	3,600.00
Leveridge, R.	4/29/22	Review update re appellate argument.	.30	435.00
Project Total:			2.30	\$ 4,035.00

Invoice Number: 11326795
May 10, 2022

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	4/01/22	Confer with R. Leveridge, A. Gaske and B. Hubbard re new claims for Issue #27 motion (0.7); analysis re litigation issues (0.8).	1.50	2,175.00
Hudson, J.	4/01/22	Confer with co-counsel re finalizing privilege log.	.10	78.50
Hudson, J.	4/01/22	Review insurers' response to requested briefing on summary judgment.	.20	157.00
Rubinstein, J.	4/01/22	Confer with co-plaintiff counsel and R. Leveridge re multiple issues (1.0); review insurer letter to Court re Issue #14 motion for partial summary judgment (0.2).	1.20	1,020.00
Rush, M.	4/01/22	Review status of meet-and-confer with insurers.	2.30	1,610.00
Rush, M.	4/01/22	Research re Issue #14.	.80	560.00
Martinez, S.	4/01/22	Finalize and file certificate of service re letter to Judge Drain for pre-motion conference.	.80	260.00
Gaske, A.	4/01/22	Confer with R. Leveridge, R. Shore, and B. Hubbard re PI proofs of claim.	.70	427.00
Gaske, A.	4/01/22	Review analysis of certain proofs of claim provided by B. Hubbard.	.50	305.00
Gaske, A.	4/01/22	Research Issue #30.	2.20	1,342.00
Leveridge, R.	4/01/22	Analyze expert issues.	.40	580.00
Leveridge, R.	4/01/22	Review material for submission to Court re stipulation and schedule (0.3); confer with co-counsel and J. Rubinstein re various litigation issues and strategy (1.0).	1.30	1,885.00
Leveridge, R.	4/01/22	Review draft interrogatory answers from co-counsel.	.40	580.00
Leveridge, R.	4/01/22	Review status of offensive discovery 0.1); communicate with opposing counsel and co-counsel re same (0.3).	.40	580.00
Leveridge, R.	4/01/22	Review insurers' letter opposing plaintiffs' request to file a motion for partial summary judgment (0.3); communications with co-counsel re same re same (0.6).	.90	1,305.00
Leveridge, R.	4/01/22	Confer with R. Shore, A. Gaske and B. Hubbard re personal injury proof of claims (0.7); review material re same (0.9).	1.60	2,320.00
Hubbard, B.	4/01/22	Review proofs of claim data for potential alternative volunteer claims (0.8); create documentation of same to provide to plaintiffs' counsel (1.8).	2.60	1,105.00
Hubbard, B.	4/01/22	Confer with R. Leveridge, A. Gaske, and R. Shore re volunteer PI claims.	.70	297.50

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	4/02/22	Correspond with co-plaintiffs' counsel re protective order issues (0.2); review revised set of responses to National Union second set of interrogatories (0.3).	.50	425.00
Hudson, J.	4/03/22	Analyze potential revision to motion re Issue #14.	.20	157.00
Shore, R.	4/04/22	Review and revise Issues #14 motion (1.3); confer with M. Rush and others re same (0.4); revise correspondence client re status/strategy/next steps re Issue #14 motion (0.5); confer with P. Breene re same (0.5); analyze new PI claims (0.5); confer with team re case status (0.3).	3.50	5,075.00
Hudson, J.	4/04/22	Analyze next steps for seeking leave to move for summary judgment.	.60	471.00
Hudson, J.	4/04/22	Confer with team re case strategy.	.30	235.50
Hudson, J.	4/04/22	Review revisions to privilege log to reflect co-counsel additions.	.10	78.50
Rubinstein, J.	4/04/22	Correspond with co-plaintiffs' counsel re discovery responses (0.2); review proposed edits to Issue #14 brief (0.2).	.40	340.00
Rush, M.	4/04/22	Revise summary judgment brief and supporting materials re Issue #14 (1.2); confer with R. Shore, R. Leveridge, A. Gaske and E. Kaminsky re same (0.4).	1.60	1,120.00
Rush, M.	4/04/22	Research re Issue #62.	.40	280.00
Rush, M.	4/04/22	Confer with team re case status.	.30	210.00
Gaske, A.	4/04/22	Confer with team re case update.	.30	183.00
Gaske, A.	4/04/22	Confer with R. Leveridge, M. Rush, R. Shore, and E. Kaminsky re revisions to motion on Issue #14.	.40	244.00
Gaske, A.	4/04/22	Review memorandum re Issue #61.	.60	366.00
Leveridge, R.	4/04/22	Confer with team re case status.	.30	435.00
Leveridge, R.	4/04/22	Communications with co-counsel re Issue #14 brief (0.8); confer with team re same (0.4).	1.20	1,740.00
Leveridge, R.	4/04/22	Communications with co-counsel and opposing counsel re matters to be submitted to the Court.	.90	1,305.00
Leveridge, R.	4/04/22	Communicate with team re personal injury claims.	.80	1,160.00
Carey, C.	4/04/22	Analyze Issue #61 research and memorandum.	1.40	665.00
Carey, C.	4/04/22	Analyze insurer correspondence re Issue #61.	.70	332.50
Carey, C.	4/04/22	Follow-up research re #Issue 61.	1.50	712.50
Kaminsky, E.	4/04/22	Research re Issue #62.	.30	168.00
Kaminsky, E.	4/04/22	Confer with team re case strategy.	.30	168.00
Kaminsky, E.	4/04/22	Confer with team re motion for summary judgment motion status and strategy.	.40	224.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Kaminsky, E.	4/04/22	Draft updated privilege log re AHC request for production.	.20	112.00
Hubbard, B.	4/04/22	Correspond with team re next steps for products non-products exemplars.	.40	170.00
Shore, R.	4/05/22	Confer with P. Breene re final revisions to Issue #14 motion (0.3); confer with A. Crawford re same (0.3); review correspondence from Judge Drain re Issue #14 motion (0.2); review correspondence from insurers re same (0.1); confer with R. Leveridge and J. Rubinstein re products hazard brief and governmental claims motion (0.4); review correspondence with PI claimants' counsel re exemplars (0.3); analyze strategy re both motions (0.3); analysis re extension of litigation scheduled (0.3); confer with co-plaintiffs' counsel re same (0.3).	2.50	3,625.00
Rubinstein, J.	4/05/22	Review update to Court re discovery (0.2); confer with co-plaintiff counsel in preparation for meet-and-confer with insurer counsel re multiple topics (0.3); confer with insurer counsel re same (0.6); analysis re status of various litigation task (0.4); review update re court conference (0.3); confer with R. Shore and R. Leveridge re Issues #14 and #27 briefs (0.3).	2.10	1,785.00
Rush, M.	4/05/22	Revise summary judgment brief re Issue #14.	1.30	910.00
Martinez, S.	4/05/22	Review and finalize exhibit materials for M. Rush affirmation in support of plaintiffs' motion for partial judgment re Issue #14.	.60	195.00
Leveridge, R.	4/05/22	Review materials in preparation for call with opposing counsel re submission to Court (1.2); confer with co-counsel re same (0.5); confer with co-counsel and opposing counsel re same (0.3); follow-up call with co-counsel re same (0.3).	2.30	3,335.00
Leveridge, R.	4/05/22	Communications with co-counsel and opposing counsel re email from Court re pre-motion hearing request.	.70	1,015.00
Leveridge, R.	4/05/22	Communicate with co-counsel re Issue #14 brief (0.9); confer with R. Shore and J. Rubinstein re same (0.4).	1.30	1,885.00
Carey, C.	4/05/22	Revise research memorandum re Issue #61.	2.10	997.50
Hubbard, B.	4/05/22	Confirm evidence for volunteer claims and document same.	.60	255.00
Shore, R.	4/06/22	Analyze litigation issues (1.3); draft correspondence to client re status of summary judgment motions and Judge Drain consideration of motion for leave to file same (1.2); review Issue #14 motion (1.0).	3.50	5,075.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Hudson, J.	4/06/22	Review correspondence re scheduling motions conference.	.10	78.50
Hudson, J.	4/06/22	Confer with potential expert witness.	.10	78.50
Rubinstein, J.	4/06/22	Review correspondence re Issues #14 and #27 briefs and supporting materials (0.3); review correspondence to client (0.1); review modification to scheduling order (0.5); analysis re third-party payor claims (0.5).	1.40	1,190.00
Rush, M.	4/06/22	Review discovery issues in preparation for meet-and-confer with NAE/Aspen.	.90	630.00
Rush, M.	4/06/22	Review case law re Issue #14.	.60	420.00
Gaske, A.	4/06/22	Revise policy comparison spreadsheets re finalizing for sharing with insurers.	1.40	854.00
Leveridge, R.	4/06/22	Communications with co-counsel and opposing counsel re status of submissions to Court and request for a conference on proposed motion (2.2); communicate with court personnel (Ms. Li) re same (0.4).	2.60	3,770.00
Shore, R.	4/07/22	Analyze new cases on Issue #14 (1.2), confer with P. Breene re same (0.3).	1.50	2,175.00
Hudson, J.	4/07/22	Confer with team re litigation status and strategy.	.40	314.00
Hudson, J.	4/07/22	Review status of final privilege log.	.10	78.50
Rubinstein, J.	4/07/22	Revise litigation task list (0.3); confer with team re litigation update (0.4); review communications with defense counsel re protective order stipulation (0.1); correspond with Debtors' counsel re service of interrogatory responses (0.1); review correspondence re Court conference re Issue #14 motion for summary judgment (0.2); review case law relevant to Issue #14 brief (1.4); continue analysis of third-party payor claims (0.2); revise draft discovery letter to Navigators (0.5).	3.20	2,720.00
Rush, M.	4/07/22	Review case law re Issue #63.	1.30	910.00
Rush, M.	4/07/22	Confer with team re case status and strategy.	.40	280.00
Gaske, A.	4/07/22	Confer with team re insurance litigation strategy and next steps.	.40	244.00
Carey, C.	4/07/22	Confer with team re case update.	.40	190.00
Carey, C.	4/07/22	Communicate with A. Gaske re Issue #61 research memorandum.	.10	47.50
Sraders, S.	4/07/22	Confer with team re current status of issues and next steps.	.40	244.00
Kaminsky, E.	4/07/22	Confer with team re litigation status.	.40	224.00
Kaminsky, E.	4/07/22	Research re Issue #63.	4.00	2,240.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Turner, C.	4/07/22	Review plaintiffs' interrogatories response to National Union.	.20	40.00
Turner, C.	4/07/22	Confer with litigation team re strategy and case updates.	.40	80.00
Hubbard, B.	4/07/22	Confer with team re ongoing status and strategy.	.40	170.00
Shore, R.	4/08/22	Analyze knowledge-based defense issues.	1.00	1,450.00
Rubinstein, J.	4/08/22	Analyze questions raised by M. Rush re Navigators discovery letter (0.2); participate in meet-and-confer call with NAE/Aspen counsel re discovery issues (0.7); review research relevant to Issue #14 motion (0.3); correspond with insurer counsel and co-plaintiffs' counsel re protective order issues (0.2); provide comments to case management order (0.2); provide comments on draft letter to Court re scheduling order and protective order (1.1).	2.70	2,295.00
Rush, M.	4/08/22	Draft meet-and-confer letters.	.80	560.00
Rush, M.	4/08/22	Participate in meet-and-confer with NAE/Aspen.	.70	490.00
Gaske, A.	4/08/22	Revise policy comparison spreadsheets.	.50	305.00
Leveridge, R.	4/08/22	Communications with co-counsel and opposing counsel re submissions to Court.	1.90	2,755.00
Sraders, S.	4/08/22	Meet-and-confer with counsel for NAE/Aspen, J. Rubinstein and M. Rush re discovery responses.	.70	427.00
Kaminsky, E.	4/08/22	Continue research re Issue #63.	1.90	1,064.00
Turner, C.	4/08/22	Update third-party subpoenas tracking sheet.	.40	80.00
Hudson, J.	4/11/22	Confer with Debtors' counsel re completing production of notice-related materials.	.10	78.50
Rubinstein, J.	4/11/22	Review communication from Judge Drain re conference scheduling (0.1); correspond with co-plaintiffs' counsel re discovery meet-and-confer correspondence (0.7); review entered scheduling order (0.1); review discovery correspondence from multiple insurers (0.6); review deposition notices served on Debtors' plaintiffs and Marsh (0.5).	2.00	1,700.00
Bonesteel, A.	4/11/22	Review incoming insurer productions and update production log.	.90	337.50
Gaske, A.	4/11/22	Review amended scheduling order.	.80	488.00
Leveridge, R.	4/11/22	Review communications filed on April 8 (0.4); communications with co-counsel re same (0.7).	1.10	1,595.00
Kaminsky, E.	4/11/22	Continue researching Issue #63.	1.10	616.00
Kaminsky, E.	4/11/22	Draft memorandum re Issue #63.	1.00	560.00
Turner, C.	4/11/22	Calendar amended scheduling order.	1.40	280.00
Hudson, J.	4/12/22	Communicate with insurer defendants re final Ad Hoc Committee privilege log.	.20	157.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Martinez, S.	4/12/22	Review recent insurance and insolvency-related updates.	.50	162.50
Leveridge, R.	4/12/22	Communicate with co-counsel re litigation strategy issues.	.70	1,015.00
Leveridge, R.	4/12/22	Review discovery requests from insurers' counsel.	.60	870.00
Kaminsky, E.	4/12/22	Research re Issue #63.	.40	224.00
Hudson, J.	4/13/22	Confer with Debtors' counsel re finalizing production of notice materials.	.10	78.50
Hudson, J.	4/13/22	Review status of request to move for partial summary judgment.	.10	78.50
Rubinstein, J.	4/13/22	Confer with R. Leveridge and B. Hubbard re third-party payor claims (0.6); provide comments on draft talking points for April 15 Court conference re governmental entities motion for partial summary judgment and correspondence re same (1.0).	1.60	1,360.00
Gaske, A.	4/13/22	Review memorandum re Issue #26 and provide comments.	.90	549.00
Gaske, A.	4/13/22	Review Issue #14 brief and related documents to prepare for potential filing.	1.40	854.00
Leveridge, R.	4/13/22	Draft talking points for pre-motion conference.	2.30	3,335.00
Leveridge, R.	4/13/22	Confer with J. Rubinstein and B. Hubbard re claims analysis.	.60	870.00
Leveridge, R.	4/13/22	Communication with co-counsel re potential experts.	.50	725.00
Carey, C.	4/13/22	Communicate with A. Gaske re Issue #61 research.	.30	142.50
Hubbard, B.	4/13/22	Confer with J. Rubinstein and R. Leveridge re next steps for claim analysis and coverage valuation.	.60	255.00
Hubbard, B.	4/13/22	Review asserted value amounts for different claim types.	1.50	637.50
Shore, R.	4/14/22	Confer with potential expert, J. Rubinstein, R. Leveridge, J. Hudson, and B. Hubbard.	.80	1,160.00
Shore, R.	4/14/22	Confer with J. Hudson, R. Leveridge, J. Rubinstein, M. Rush, A. Gaske, S. Sradars, E. Kaminsky, B. Hubbard, A. Bonesteel, S. Martinez, and C. Turner re case strategy.	.70	1,015.00
Shore, R.	4/14/22	Review and revise talking points outline for conference with Judge Drain re motion for leave to file summary judgment motions (1.0); analyze new cases on Issue #14 (0.6); confer with E. Kaminsky re same (0.4).	2.00	2,900.00
Hudson, J.	4/14/22	Confer with team re case status.	.70	549.50
Hudson, J.	4/14/22	Review claims data in connection with litigation strategy.	.10	78.50

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Hudson, J.	4/14/22	Confer with team re potential expert.	.80	628.00
Rubinstein, J.	4/14/22	Confer with potential expert, R. Shore, R. Leveridge, J. Hudson, and B. Hubbard (0.8); review proposed edits to April 15 hearing talking points (0.3); update litigation task list (0.4); confer with team re case status (0.7); correspond with Debtors' counsel re request for admissions responses (0.1); analysis re governmental entities brief (0.6); review discovery deficiency letter sent on behalf of Liberty (0.2).	3.10	2,635.00
Martinez, S.	4/14/22	Confer with J. Hudson, J. Rubinstein, R. Shore, E. Kaminsky, A. Gaske, A. Farra, S. Sraders, I. Agwu, J. Girgenti, C. Carey, B. Hubbard, A. Bonesteel, S. Ogrey, and C. Turner re case status and strategy.	.70	227.50
Martinez, S.	4/14/22	Review and finalize exhibits in support of plaintiffs' motion for summary judgment.	.30	97.50
Bonesteel, A.	4/14/22	Confer with team re case strategy.	.70	262.50
Gaske, A.	4/14/22	Confer with team re litigation case strategy and next steps.	.70	427.00
Gaske, A.	4/14/22	Review revisions to Issue #14 brief.	.40	244.00
Leveridge, R.	4/14/22	Review materials in preparation for meeting with potential expert (0.4); confer with potential experts and team (0.8).	1.20	1,740.00
Leveridge, R.	4/14/22	Confer with team re litigation status.	.70	1,015.00
Leveridge, R.	4/14/22	Review relevant documents in preparation for pre-motion conference (1.2); communications with co-counsel re same (0.7).	1.90	2,755.00
Leveridge, R.	4/14/22	Review discovery letter from opposing counsel.	.40	580.00
Leveridge, R.	4/14/22	Review recent developments in case law re Issue #14 (0.3); review revisions to brief re same (0.3); communications with co-counsel re same (0.1).	.70	1,015.00
Carey, C.	4/14/22	Confer with team re case status.	.70	332.50
Sraders, S.	4/14/22	Confer with team re recent developments and strategy for next steps.	.70	427.00
Sraders, S.	4/14/22	Confer with potential expert B, R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, and B. Hubbard.	.80	488.00
Kaminsky, E.	4/14/22	Research re Issue #63.	1.00	560.00
Kaminsky, E.	4/14/22	Confer with team re litigation status.	.70	392.00
Kaminsky, E.	4/14/22	Revise motion for summary judgment.	.30	168.00
Turner, C.	4/14/22	Confer with litigation team re strategy and case updates.	.70	140.00
Hubbard, B.	4/14/22	Finalize documentation for analysis of asserted values by claim type.	5.50	2,337.50

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Hubbard, B.	4/14/22	Confer with potential expert re work.	.80	340.00
Hubbard, B.	4/14/22	Confer with team re ongoing status and strategy.	.70	297.50
Shore, R.	4/15/22	Analyze motion for summary judgment issues in preparation for conference with Judge Drain.	1.50	2,175.00
Hudson, J.	4/15/22	Attend conference with Judge Drain re request to move for summary judgment.	.60	471.00
Hudson, J.	4/15/22	Confer with co-plaintiffs re conference with Judge Drain re request to move for summary judgment.	.10	78.50
Rubinstein, J.	4/15/22	Analysis re Issue #14 brief (0.4); communicate with co-plaintiff counsel re draft request for admissions responses (0.1); participate in Court call re brief submission (0.6); communicate with team re same (0.6); confer with co-plaintiff counsel re discovery (0.8); analysis re case law research (0.3).	2.80	2,380.00
Bonesteel, A.	4/15/22	Review incoming insurer productions and update production log.	.90	337.50
Gaske, A.	4/15/22	Attend telephonic hearing re request to file motion for partial summary judgment.	.60	366.00
Gaske, A.	4/15/22	Review TDPs re valuation question from B. Hubbard.	1.00	610.00
Leveridge, R.	4/15/22	Prepare for pre-motion conference (1.2); participate in pre-motion conference (0.6); communications with co-counsel re same and related matters (1.1).	2.90	4,205.00
Leveridge, R.	4/15/22	Communications with opposing counsel re status of stipulated order re modification to protective order re insurer access to POE/confidential information (1.1); draft communication to court personnel (Ms. LI) re same (0.2).	1.30	1,885.00
Kaminsky, E.	4/15/22	Analyze production re deficiency letter.	1.50	840.00
Kaminsky, E.	4/16/22	Draft response to defendant's deficiency letter re defensive production.	1.90	1,064.00
Shore, R.	4/18/22	Communicate with client re pre-motion conference results (0.7); analyze strategy in light of denial of leave to file motion at this time (1.1).	1.80	2,610.00
Rubinstein, J.	4/18/22	Revise letter to Navigators re discovery (0.2); review correspondence with Court re protective order (0.1); communications with co-plaintiffs' counsel re strategy (0.3); communicate with team re discovery issues (0.4).	1.00	850.00
Rush, M.	4/18/22	Communicate with team re deposition prep.	.20	140.00
Rush, M.	4/18/22	Review insurer discovery responses and status of meet-and-confers.	2.20	1,540.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	4/18/22	Communicate with team re discovery issues (0.4); communicate with Court and other counsel re proposed stipulation (0.3); communicate with client re Court conference April 15 (0.8).	1.50	2,175.00
Kaminsky, E.	4/18/22	Research evidentiary law re defensive production.	2.60	1,456.00
Kaminsky, E.	4/18/22	Draft response to defendant's deficiency letter re production.	1.10	616.00
Turner, C.	4/18/22	Review and organize stipulation by plaintiffs and certain insurers.	.30	60.00
Rush, M.	4/19/22	Revise letter to Navigators.	.30	210.00
Rush, M.	4/19/22	Draft meet-and-confer letters to insurers.	1.90	1,330.00
Leveridge, R.	4/19/22	Review discovery issue raised by insurers (0.2); review material re same (0.7); confer with E. Kaminsky re meet-and-confer with insurers (0.3).	1.20	1,740.00
Sraders, S.	4/19/22	Review notes from March 31, 2022 meet-and-confer.	.20	122.00
Kaminsky, E.	4/19/22	Confer with R. Leveridge re meet-and-confer with defendants.	.30	168.00
Hudson, J.	4/20/22	Review draft response to insurers' deficiency letter.	.10	78.50
Rubinstein, J.	4/20/22	Communications with co-plaintiff counsel re strategy.	.30	255.00
Rubinstein, J.	4/20/22	Revise litigation task list.	.40	340.00
Leveridge, R.	4/20/22	Review communications from co-counsel re legal research and discovery issues.	1.20	1,740.00
Leveridge, R.	4/20/22	Review communications from opposing counsel re discovery.	.60	870.00
Shore, R.	4/21/22	Analyze insurance litigation issues and strategy.	1.00	1,450.00
Shore, R.	4/21/22	Confer with team re case status and strategy.	.90	1,305.00
Hudson, J.	4/21/22	Confer with team re case update.	.90	706.50
Rush, M.	4/21/22	Confer with team re litigation status.	.90	630.00
Gaske, A.	4/21/22	Confer with team re strategy and next steps.	.90	549.00
Leveridge, R.	4/21/22	Confer with team re tasks ahead (0.9); communicate with co-counsel re legal research and discovery issues (1.0).	1.90	2,755.00
Carey, C.	4/21/22	Confer with team re case status and strategy.	.90	427.50
Sraders, S.	4/21/22	Confer with team re recent developments and strategy for next steps.	.90	549.00
Kaminsky, E.	4/21/22	Confer with team re litigation strategy.	.90	504.00
Turner, C.	4/21/22	Confer with litigation team re strategy and case updates.	.90	180.00
Turner, C.	4/21/22	Review and organize third-party subpoenas.	.50	100.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Hubbard, B.	4/21/22	Meet with team re ongoing status and strategy.	.90	382.50
Leveridge, R.	4/22/22	Communications with co-counsel and opposing counsel re discovery issues.	.60	870.00
Turner, C.	4/22/22	Continue reviewing and organizing third-party subpoenas.	.30	60.00
Rubinstein, J.	4/25/22	Review multiple subpoenas served on third parties (0.3); correspond with co-plaintiffs re Marsh deposition (0.2); review discovery correspondence re Debtors' privilege log re insurance review (0.1); confer with co-plaintiffs' counsel re privilege log issues (0.7); review Marsh objections and responses to deposition subpoena (0.5).	1.80	1,530.00
Rush, M.	4/25/22	Review Marsh documents.	1.80	1,260.00
Leveridge, R.	4/25/22	Communicate with co-counsel re discovery inquiry from opposing counsel (0.6); communicate with opposing counsel re same (0.2); review material re discovery to Marsh (0.8).	1.60	2,320.00
Sraders, S.	4/25/22	Review personal injury claimant presentation in mediation.	.40	244.00
Kaminsky, E.	4/25/22	Confer with UCC and Debtors re discovery strategy.	.70	392.00
Rubinstein, J.	4/26/22	Review claim valuation analysis (0.8); analysis re response to discovery deficiency letter to committees (0.3); revise letters to multiple insurers re discovery deficiencies (1.4); confer with M. Rush and R. Leveridge re discovery strategy (0.6); confer with counsel re Marsh deposition subpoena and analysis re same (1.2).	4.30	3,655.00
Rush, M.	4/26/22	Review letter to Liberty re discovery issues.	2.50	1,750.00
Rush, M.	4/26/22	Confer with team re discovery issues.	.60	420.00
Rush, M.	4/26/22	Confer with co-counsel re subpoenas.	1.20	840.00
Rush, M.	4/26/22	Review Marsh documents.	1.00	700.00
Leveridge, R.	4/26/22	Communicate with team re PI claims material.	.80	1,160.00
Leveridge, R.	4/26/22	Communications with Debtors' counsel re discovery issues (0.7); communications with opposing counsel and UCC counsel re same (0.7); review material re same (0.9).	2.30	3,335.00
Leveridge, R.	4/26/22	Confer with team re offensive and defensive discovery issues (0.6); review and revise communications to opposing counsel (1.2).	1.80	2,610.00
Kaminsky, E.	4/26/22	Draft talking points re meet-and-confer with insurers re discovery dispute.	1.90	1,064.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Hubbard, B.	4/26/22	Review report from personal injury lawyers re valuation of individual claim damages and document findings re same (2.1); review trust distribution procedures to respond to question re individual claim damages valuation (0.6).	2.70	1,147.50
Hudson, J.	4/27/22	Review materials confirming scope of time during which common interest applied to communications with various parties.	.10	78.50
Rubinstein, J.	4/27/22	Review co-plaintiffs' edits to letter to Liberty re discovery issues (0.2); communicate with M. Rush re former Marsh employee deposition preparation (0.4).	.60	510.00
Rush, M.	4/27/22	Review Marsh documents.	2.20	1,540.00
Rush, M.	4/27/22	Revise letters to insurers re discovery issues.	2.40	1,680.00
Leveridge, R.	4/27/22	Analyze offensive and defensive discovery issues (1.2); review communications with co-counsel and opposing counsel re same (0.5); review memorandum from E. Kaminsky (0.1).	1.80	2,610.00
Leveridge, R.	4/27/22	Analyze third-party discovery issues.	.40	580.00
Kaminsky, E.	4/27/22	Revise talking points re meet-and-confer with insurers re discovery dispute.	2.90	1,624.00
Shore, R.	4/28/22	Confer with team re litigation status.	1.00	1,450.00
Hudson, J.	4/28/22	Review status of review of materials confirming scope of time during which common interest applied to communications with various parties.	.10	78.50
Hudson, J.	4/28/22	Confer with team re case status.	1.00	785.00
Hudson, J.	4/28/22	Confer with co-plaintiffs' counsel re responding to deficiency letter.	.50	392.50
Rubinstein, J.	4/28/22	Confer with R. Leveridge re strategy (0.5); analyze and provide comments on response to Liberty deficiency letter to committees (0.6); confer with co-plaintiffs' counsel re same (0.6); revise litigation task list (0.7); confer with team re case and strategy (1.0); analysis re Marsh deposition subpoenas (0.4).	3.80	3,230.00
Rush, M.	4/28/22	Continue reviewing Marsh documents.	3.80	2,660.00
Rush, M.	4/28/22	Revise letters to insurers re discovery issues.	.20	140.00
Rush, M.	4/28/22	Confer with team re case status.	1.00	700.00
Rush, M.	4/28/22	Review claims data.	.40	280.00
Bonesteel, A.	4/28/22	Confer with team re ongoing case strategy.	1.00	375.00
Gaske, A.	4/28/22	Confer with team re insurance litigation strategy and next steps.	1.00	610.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	4/28/22	Communicate with team re status of Marsh production review.	.10	61.00
Leveridge, R.	4/28/22	Confer with team re strategy and planning for litigation.	1.00	1,450.00
Leveridge, R.	4/28/22	Confer with J. Rubinstein re litigation strategy.	.50	725.00
Leveridge, R.	4/28/22	Analyze discovery matters (1.1); communicate with co-counsel re same (0.4).	1.50	2,175.00
Sraders, S.	4/28/22	Confer with team re recent developments and strategy for next steps.	1.00	610.00
Kaminsky, E.	4/28/22	Research re discovery meet-and-confer.	1.40	784.00
Kaminsky, E.	4/28/22	Confer with team re litigation status and strategy.	1.00	560.00
Kaminsky, E.	4/28/22	Confer with Committees re meet-and-confer with insurers on discovery.	.50	280.00
Turner, C.	4/28/22	Confer with litigation team re strategy and case updates.	1.00	200.00
Turner, C.	4/28/22	Review and organize Navigators and Liberty letters.	.30	60.00
Hubbard, B.	4/28/22	Confer with team re status and strategy.	1.00	425.00
Hubbard, B.	4/28/22	Analyze evidence of claims history.	.40	170.00
Shore, R.	4/29/22	Review and provide comments to letter to insurers re alleged deficiencies in discovery responses.	1.50	2,175.00
Hudson, J.	4/29/22	Attend meet-and-confer session with insurers re Committee responses to discovery.	.70	549.50
Hudson, J.	4/29/22	Summarize timeline and evidence to demonstrate common interest with Debtors re insurance.	.90	706.50
Rubinstein, J.	4/29/22	Review proposed edits to discovery correspondence (0.4); confer with co-plaintiff counsel re discovery issues (0.5); participate in meet-and-confer discussion with defendants and co-plaintiffs' counsel (0.7); confer with Debtors' counsel re 30(b)(6) preparation (0.6); analysis re same (0.6).	2.80	2,380.00
Rush, M.	4/29/22	Review Marsh documents.	3.90	2,730.00
Leveridge, R.	4/29/22	Confer with co-counsel re discovery issues (0.6); review edits to draft letter to insurers re discovery issues (0.7); meet-and-confer with insurers re discovery issues (0.7); follow up call with co-counsel re same (0.3).	2.30	3,335.00
Leveridge, R.	4/29/22	Confer with Debtors' counsel re third-party discovery.	.70	1,015.00

Invoice Number: 11326795
May 10, 2022

Name	Date	Services	Hours	Amount
Kaminsky, E.	4/29/22	Meet-and-confer with insurers re request for productions.	.70	392.00
Project Total:			250.50	\$ 221,941.00
TOTAL CHARGEABLE HOURS			266.10	
TOTAL FEES				\$ 241,671.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	9.00	1,800.00	16,200.00
Shore, R.	25.70	1,450.00	37,265.00
Hudson, J.	10.30	785.00	8,085.50
Rubinstein, J.	36.00	850.00	30,600.00
Rush, M.	37.90	700.00	26,530.00
Martinez, S.	2.90	325.00	942.50
Bonesteel, A.	3.50	375.00	1,312.50
Gaske, A.	14.80	610.00	9,028.00
Leveridge, R.	53.90	1,450.00	78,155.00
Carey, C.	8.10	475.00	3,847.50
Sraders, S.	5.10	610.00	3,111.00
Kaminsky, E.	29.40	560.00	16,464.00
Turner, C.	10.70	200.00	2,140.00
Hubbard, B.	18.80	425.00	7,990.00
TOTALS	266.10		\$ 241,671.00

TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	4.30	860.00
A009	Meetings / Communications with AHC & Creditors	9.00	14,835.00
A019	Plan of Reorganization / Disclosure Statement	2.30	4,035.00
A020	Insurance Adversary Proceeding	250.50	221,941.00

TOTAL FEES AND EXPENSES \$ 241,671.00